

## REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of June 29, 2007 (Office Action). As this action is timely filed within the three-month shortened statutory period, no fees are believed due. However, the Office is expressly authorized to charge any deficiencies or credit any overpayments to Deposit Account 50-0951.

As an initial matter, Applicants thank the Examiner for acknowledging the persuasiveness of the previously submitted arguments. In the Office Action, however, each of the claims was rejected on the basis of a new combination of references.

Claims 1, 3-6, 8-10, 12-15, 17-19, 21-24, and 26-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 5,860,064 to Henton (hereinafter Henton), in view of U.S. Patent 6,865,572 to Boguraev, *et al.* (hereinafter Boguraev), and further in view of U.S. Patent 6,947,893 to Iwaki, *et al.* (hereinafter Iwaki). Claims 2, 7, 11, 16, 20, and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Henton in view of Boguraev and Iwaki, and further in view of U.S. Patent 7,103,548 to Squibbs, *et al.* (hereinafter Squibbs).

Although Applicants respectfully disagree with the rejections, Applicants nevertheless have amended each of the independent claims so as to expedite prosecution of the present application by emphasizing certain aspects of the invention. Applicants respectfully note, however, that neither the amendments nor cancellation of claims are intended as, and should not be interpreted as, the surrender of any subject matter. Accordingly, Applicants respectfully reserve the right to present the original version of any of the amended claims in any future divisional or continuation applications from the present application.

In particular, Applicants have amended independent Claims 1, 10, and 19 have been amended to further emphasize certain aspects of the invention. The claim amendments, as discussed herein, are fully supported throughout the Specification. No new matter has been introduced by virtue of any of the claim amendments.

### **Certain Aspects Of Applicants' Invention**

Prior to addressing the cited references, it may be useful to reiterate certain aspects of Applicants' invention. One embodiment of the invention, typified by Claim 1, is a method for preparing a document to be read by a text-to-speech reader.

The method can include identifying two or more voice types available to the text-to-speech reader, and identifying text elements within the document. Identifying text elements, more particularly, can comprise marking gross structural subdivisions of text with a first set of sequenced tags, marking individual paragraphs of the text with a second set of sequenced tags, and marking text elements with a third set of sequenced tags to generate a hierarchical tree identifying the text elements. (See, e.g., Specification, paragraph [0021], lines 1-9.)

The method further can include grouping similar text elements together. The step of grouping similar text elements can include generating one or more clusters according to each identifiable topic of the document. (See, e.g., Specification, paragraph [0022], lines 1-3, and paragraph [0029], lines 1-7.) Additionally, the step of grouping can include syntactically parsing the document and subsequently performing text mining to determine which text elements in the document are similar. More particularly, similarity can be based upon lexical affinities among the text elements. (See, e.g., Specification, paragraph [0034], lines 1-3.). The method also can include classifying the text elements according to voice types available to the text-to-speech reader.

### **The Claims Define Over The Cited References**

As already noted, independent Claims 1, 10, and 19 were each rejected as unpatentable over Henton in view of Boguraev and in further view of Iwaki. Applicants respectfully submit, however, that the references fails to teach or suggest every feature recited in the claims.

*identifying text elements*

For example, none of the references, alone or in combination, discloses identifying text elements in the manner recited in independent Claims 1, 10, and 19. Henton is cited as disclosing this feature, but Henton only describes a user's capability to "select portions of text" using the familiar point-and-click operation performed with a standard graphical interface and computer mouse:

"In the preferred embodiment of the present invention, the user selects a word of text by manipulating input controller 15 so that pointer 205 is placed on or alongside the desired word and then initiating the necessary selection operation, e.g., depressing a button on the mouse in the preferred embodiment. Note that letters, words, phrases, sentences, etc., are all selectable in a similar fashion, by manipulating pointer 205 during the selection operation, as is well known in the art and commonly referred to as 'clicking and dragging' or 'double clicking'. Similarly, other well known text selection mechanisms, such as keyboard control of cursor 203, are equally applicable to the present invention.

\* \* \* \*

Once a portion of text has been selected, the volume and duration of the resulting speech output can be modified by the user. In the preferred embodiment of the present invention, when a portion of text has been selected a box surrounding the selected portion of text is displayed. (Henton, Col. 5, line 61 – Col. 6, line 10.) (Emphasis supplied.)

Applicants respectfully submit that Henton's user selection made by pointing-and-clicking with a computer mouse is not at all comparable to Applicants' technique for identifying text elements. Firstly, Henton describes only a user's highlighting a selected

word as it is displayed. (See, e.g., Henton, Figure 3; see also Col. 6, lines 8-10.) Henton, however, nowhere describes the marking of text elements with a sequence of tags of any kind. Moreover, Henton does not even contemplate identifying text elements by marking gross structural subdivisions of text, marking individual paragraphs of the text, and marking text elements. Specifically, Henton fails to teach or suggest marking gross structural subdivisions of text with a first set of sequenced tags, marking individual paragraphs of the text with a second set of sequenced tags, and marking text elements with a third set of sequenced tags to generate a hierarchical tree identifying the text elements, as recited in Claims 1, 10, and 19. Henton further fails to teach or suggest generating from this procedure a hierarchical tree identifying the text elements, as further recited in Claims 1, 10, and 19.

#### *grouping similar text elements*

Henton is acknowledged at page 3 of the Office Action as failing to disclose grouping similar text elements and classifying the text elements according to voice types. This feature, it is asserted, is nevertheless disclosed by Boguraev.

Boguraev discloses a technique for characterizing a document by "topics." (See, e.g., Boguraev, Col. 14, line 57 – Column 15, line 7. Boguraev discloses characterization based, for example, on discourse segmentation, phrasal analysis, anaphora resolution, and generation of a referent set. Regardless of such characterization by topic, however, Boguraev fails to disclose further performing the step of generating one or more clusters according to each topic, as recited in Claims 1, 10, and 19. Boguraev further fails to disclose grouping the text elements according to similarity, wherein similarity is based upon lexical affinities among the text elements, as further recited in Claims 1, 10, and 19.

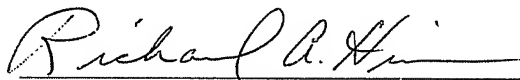
### CONCLUSION

Accordingly, no combination of the cited references teaches or suggests every feature recited in Claims 1, 10, and 19. Applicants respectfully submit, therefore, that Claims 1, 10, and 19 each define over the prior art. Applicants further respectfully submit that, whereas each of the remaining claims depends from Claim 1, 10, or 19 while reciting additional features, each of the dependent claims likewise defines over the prior art.

Applicants believe that this application is now in full condition for allowance. Allowance of the application, accordingly, is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Response, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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